

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3

4 JOSE ALBINO LUCERO JR., on Behalf of  
5 Himself and all Others Similarly Situated,

6 Plaintiffs,

7 v.

8 SOLARCITY CORP.,

9 Defendant.

Case No. 3:15-cv-05107

**DECLARATION OF KOURI  
ROSENBERG IN SUPPORT OF  
DEFENDANT SOLARCITY CORP.'S  
OPPOSITION TO MOTION FOR  
CLASS CERTIFICATION**

**Hon. Richard Seeborg  
Action Filed: November 6, 2015**

**Hearing Date: March 9, 2017  
Time: 1:30 p.m.**

11  
12 **DECLARATION OF KOURI ROSENBERG**

13 I, Kouri Rosenberg, declare:

14 1. I am a Senior Systems Support Engineer at SolarCity and I currently work in  
15 SolarCity's office [REDACTED]. I have worked at SolarCity since 2009, in various  
16 roles within SolarCity. In my various roles within SolarCity, I have gained an intimate  
17 understanding of SolarCity's phone systems and their technological capabilities. I have personal  
18 knowledge of the facts set forth herein and, if called as a witness, I could and would testify  
19 competently to those facts.

20 2. From [REDACTED] through [REDACTED], SolarCity's sales team utilized an  
21 [REDACTED]  
22 [REDACTED]

23 3. Beginning in [REDACTED] SolarCity's sales team switched to the [REDACTED]  
24 [REDACTED]. [REDACTED]  
25 [REDACTED]  
26 [REDACTED]

27 4. SolarCity's sales team never purchased or used an [REDACTED]  
28 [REDACTED]

1 [REDACTED]. Nor did SolarCity's sales team ever purchase [REDACTED]  
2 [REDACTED].

3 5. In [REDACTED] SolarCity's sales team began using a [REDACTED]  
4 [REDACTED] SolarCity's sales team used the [REDACTED]. During this  
5 period, SolarCity's sales team [REDACTED].

6 6. At no point did SolarCity's sales team ever purchase or use [REDACTED]  
7 [REDACTED]  
8 process. The [REDACTED]  
9 [REDACTED] offered [REDACTED]  
10 [REDACTED].

11 7. From [REDACTED], SolarCity's sales team has [REDACTED]  
12 [REDACTED]. To date, SolarCity's sales team [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]. While [REDACTED]  
16 [REDACTED]  
17 [REDACTED].

18  
19 Dated: January 20, 2017

20   
21 KOURI ROSENBERG